

Michael J. Frevola
Christopher R. Nolan
F. Robert Denig
Marie E. Larsen
HOLLAND & KNIGHT LLP
31 West 52nd St.
New York, NY 10019
Telephone: (212) 513-3200
Telefax: (212) 385-9010
michael.frevola@hklaw.com
christopher.nolan@hklaw.com
robert.denig@hklaw.com
marie.larsen@hklaw.com

ATTORNEYS FOR PLAINTIFF
COMMODITIES & MINERALS ENTERPRISE LTD.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COMMODITIES & MINERALS ENTERPRISE LTD.,

Plaintiff,

-against-

GRETCHEN SHIPPING INC., KYMA SHIP
MANAGEMENT INC., PARIS KATSOUFIS,
LAMBROS KATSOUFIS, V&H VENTURES, LTD.,
GERARDO A. VAZQUEZ, P.A. d/b/a VAZQUEZ &
ASSOCIATES, GERARDO A. VAZQUEZ,
VIPSEN CORP., and STEPHEN HARRINGTON,

Defendants.

Civil Action No. 13 CV 6548 (PKC)

**ANSWER TO
COUNTERCLAIM**

Plaintiff, Commodities & Minerals Enterprise Ltd. ("CME"), by its attorneys Holland & Knight LLP, respectfully files this Answer to the Counterclaim of defendant Gretchen Shipping

Inc. ("Gretchen") asserted by Gretchen in the Answer to Amended Complaint and Counterclaim filed in the Court on December 13, 2013 (the "Counterclaim"), and responds as follows:

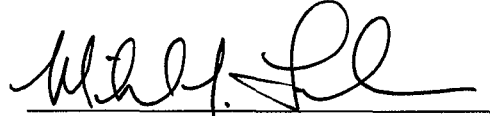
Answer to Counterclaim of Gretchen

1. Deny knowledge or information sufficient to admit or deny the allegations contained in paragraph 157 of the Counterclaim.
2. Admit the allegations contained in paragraph 158 of the Counterclaim.
3. Admit that CME chartered the *M/V GENERAL PIAR* (the "Vessel") in January 2010 under the terms set forth in the charter party annexed to CME's Amended Complaint as Exhibit 1 (the "Charter"), and further admit that the terms of the Charter speak for themselves, but deny the remainder of the allegations contained in paragraph 159 of the Counterclaim.
4. Admit that CME re-delivered the Vessel on or about October 20, 2013, but deny the remainder of the allegations contained in paragraph 160 of the Counterclaim.
5. Deny the allegations contained in paragraph 161 of the Counterclaim.
6. Admit that Gretchen's claim against CME is subject to arbitration in New York pursuant to the terms of the Charter, but deny knowledge or information sufficient to admit or deny the remaining allegations contained in paragraph 162 of the Counterclaim.

Dated: January 2, 2014
New York, New York

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to read 'M. J. Frevola', written over a horizontal line.

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Facsimile: (212) 385-9010
Email: michael.frevola@hklaw.com
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robert.denig@hklaw.com
marie.larsen@hklaw.com

Counsel for Plaintiff
Commodities & Minerals Enterprise Ltd.